## **REMARKS**

Claims 1-4, 10, 15-23 and 27-39 are pending. Claim 20 is amended.

In paragraph 6, on page 3 of the Office Action, claims 1-4, 10, 15-19, 23 and 27-39 were indicated as allowed, and in paragraph 7, same page, claim 22 was objected to.

Applicants appreciate this indication of allowed and allowable subject matter. However, Applicants submit that claim 21 from which claim 22 depends is allowable for the reasons discussed below.

In paragraph 2, on page 2 of the Office Action, claims 20 and 21 were rejected under 35 U.S.C. §102(b) as anticipated by Nagatsuna, U.S. Patent No. 4,876,572. The rejection is respectfully traversed.

Applicants' claim 20 calls for a developing unit, comprising a container that houses a developing agent; a developing agent holding member that holds the developing agent; a holding member support member that supports the developing agent holding member; and a contaminant removing member that is detachably attached to the holding member support member, wherein the container and the holding member support member are a unitary structure to which the contaminant removing member is detachably attached.

Applicants' claim 21 calls for a processing device, comprising a photosensitive body; a photosensitive body support member that supports the photosensitive body; and a developing unit that is attached to and detached from the photosensitive body support member; the developing unit comprising a container that houses a developing agent; a developing agent holding member that holds the developing agent; a holding member support member that supports the developing agent holding member; and a contaminant removing member that is detachably attached to the holding member support member.

Nagatsuna, in Fig. 2, which solves the problems of the prior art to Nagatsuna, where it was difficult to precisely position the developing device 26 and cleaning device 28 relative to the drum 24 (shown in Fig. 1). Thus, Nagatsuna provided a different methodology.

As shown in Fig. 2 of Nagatsuma, an image forming case 52 is formed that has a plurality of openings 78 in its lower surface. The image forming case 52 can be pivoted around a shaft 54 as shown by arrow B. However, the drum 60 is mounted within a recess 82 of a positioning portion 68 which extends through one of the openings 78. To one side of the drum 60 is a developing device 62 that is received on positioning portions 72, 70, extending through openings 78 in the image forming case 52, using reference shaft 84 and developing roller 86 shaft 86A.

On the opposite side of the drum 60, from the developing device 62, is a cleaning device 64. The cleaning device 64 has a cleaning blade 102 and a brush 104 that contact the drum 60. However, the cleaning device is positioned within the image forming case 52 by means of positioning portions 76, 74 which receive reference shafts 90, 88. As shown in Fig. 2, neither the cleaning device 64 nor the developing device 62 appear to actually rest on the image forming case 52, rather they are retained in position by the various shafts being received on the positioning portions. Further, the cleaning device 64 and the developing device 62 are clearly separate structures mounted on opposite sides of the drum 60.

Conversely, Applicants' claim 20 calls for a container that houses a developing agent, and a holding member support member that supports a developing agent holding member, wherein the container and the holding member support member are a unitary structure to which a contaminant removing member is detachably attached. As addressed above, Nagatsuna does not disclose such a structure.

Further, with respect to claim 21, directed to a processing device, it calls for a developing unit similar to that found in claim 20 but without the reference to the unitary structure. This is because it also calls for a photosensitive body and a photosensitive body support member that supports the photosensitive body which is separate from the developing unit. If one is to allege the image forming case 52 forms the support structure, then the image forming case 52 supports all elements in Nagatsuna, and there is no separate photosensitive body support member or a holding member support member that supports the developing agent holding member to which the contaminant removing member is detachably attached. Further, without making the allegation that the image forming case 52 forms the holding member support member, then there is no holding member support member supporting a developing agent holding member to which a contaminant removing member is detachably attached. As such, Nagatsuna does not literally disclose the invention of either claim 20 or 21, and a rejection under 35 U.S.C. §102 is inappropriate. Further, for the reasons discussed, Nagatsuna does not suggest the claimed invention.

In paragraph 4, on page 3 of the Office Action, claims 20 and 21 were rejected under 35 U.S.C. §102(b) being anticipated by Nittani et al., U.S. Patent No. 6,459,869 (Nittani). The rejection is respectfully traversed.

Applicants' claims 20 and 21 have been described above. Nittani discloses a two-part process cartridge. The two parts are the drum unit 241 and the developing unit 242. The cleaning member 246 is mounted in the drum unit 241 with the photosensitive drum (Fig. 11; col. 14, lines 50-64). There is no indication that the cleaning member, i.e., contaminant removing member, is detachably attached to anything. Further, it is clearly not detachably attached to the holding member support

member supports the developing agent holding member which holds the developing agent. In Nittani, the equivalent structure concerning the developing agent is found in the developing unit 242.

Thus, Nittani does not disclose a container and a holding member support member that are a unitary structure to which the contaminant removing member is detachably attached (claim 20), nor does it disclose a developing unit that includes a developing agent holding member, a holding member support member that supports the developing agent holding member, and a contaminant removing member that is detachably attached to the holding member support member that is separate from a photosensitive body support member that supports the photosensitive body (claim 21).

Because Nittani does not literally disclose the claimed invention, a rejection under 35 U.S.C. §102 is inappropriate. Further, for the reasons discussed Nittani does not suggest the claimed invention. Therefore, it is respectfully requested the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 20-22 in addition to previously allowed claims 1-4, 10, 14-19, 23 and 27-30 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully subm

James A. Oliff

Registration No. 27,075

Robert A. Miller

Registration No. 32,771

JAO:RAM/kap

Date: September 6, 2005

OLIFF & BERRIDGE, PLC P.O. Box 19928 Alexandria, Virginia 22320 Telephone: (703) 836-6400 DEPOSIT ACCOUNT USE
AUTHORIZATION
Please grant any extension
necessary for entry;
Charge any fee due to our
Deposit Account No. 15-0461